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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JUANA A. CRUZ DE RAMIREZ, an
individual,

Plaintiff

vs.

CARDENAS MARKETS, LLC aka
CARDENAS, a foreign limited liability
company; LAMANZA LLC, a domestic
limited liability company; DOE
MAINTENANCE COMPANY 1-10; DOE
INDIVIDUALS 1-20; and ROE BUSINESS
ENTITIES 1-20, inclusive,

Defendants

CASE NO.: 2:19-cv-00814-RFB-BNW

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND JOINT PRETRIAL
ORDER DEADLINE (FIRST REQUEST)**

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Joint Pretrial Order deadline in the above-captioned matter. Good cause exists to extend the remaining deadline for the reasons explained below.

A. Reasons For the Extension

On March 22, 2021 a hearing was held regarding Defendant's Motion for Summary Judgment which was subsequently denied. The courts ordered that the parties submit their Joint Pretrial Order within thirty (30) days of said ruling. Recently, counsel conferred regarding an

1 extension of time to submit the parties' Joint Pretrial Order in this case. Counsel agree that
2 additional time is needed in order to fully and properly identify portions of deposition transcripts
3 intended to be used at the time of trial and provide objections regarding the same.

4 As such, the April 22, 2021 deadline should be extended so that the parties are able to
5 provide a proper Joint Pretrial Order to the Court.

6 **B. Proposed Revised Pretrial Order Schedule**

7 The Joint Pretrial Order is due on April 22, 2021 and the parties are requesting the
8 deadline be moved to May 13, 2021. This request for an extension of time is not sought for any
9 improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the
10 purpose of allowing sufficient time to adequately prepare their pretrial order to include portions of
11 depositions in which the parties intend to use at the time of trial. The parties respectfully submit
12 that the reasons set forth above constitute compelling reasons and good cause for the short
13 extension.

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WHEREFORE, the parties respectfully request that this Court extend the deadline for submitting their Joint Pretrial Order from the current deadline as outlined above.

DATED this 21st day of April, 2021.

DATED this 21st day of April, 2021.

MAINOR WIRTH, LLP

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER, LLP**

/s/ Ash Marie Blackburn

/s/ Michael Lowry

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Counsel for Plaintiff

ORDER

IT IS SO ORDERED.

DATED this 22nd day of April, 2021.


RICHARD E. BOULWARE, II
United States District Court

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